

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

PACIFIC INDEMNITY COMPANY )

15 Mountain View Road )

Warren, NJ 07061-1615 )

Plaintiff, )

v. )

ALFRED KEMP, Individually and d/b/a )

KEMP PLUMBING )

P.O. Box 1322 )

Pembroke, MA 02359 )

and )

MARTIN SANDBORG, Individually and d/b/a )

SANDBORG PLUMBING AND HEATING )

13 Liberty Street )

Sandwich, MA 02563, )

Defendants. )

C.A. No.: 04-11975-RWZ

BBO# 552588

**DEFENDANT, ALFRED KEMP, Individually and d/b/a KEMP PLUMBING's  
SUPPLEMENTAL REQUESTED JURY VOIR DIRE**

Now comes the Defendant, Alfred Kemp, Individually and d/b/a Kemp Plumbing, and hereby requests the Court to submit the following supplemental question to the jury pool during voir dire in addition to the general voir dire questions posed by the court to the jury pool and the prior jury voir dire request made by defendant Kemp:

1. Have you, any family member, relative or close friend ever invested in, worked for or have a business affiliation with EMC Corp. or other known Roger Marino-affiliated?

Defendant, Al Kemp, Individually and d/b/a  
Kemp Plumbing,  
By his attorneys,

/s/ Christopher G. Betke  
Christopher G. Betke, BBO# 552588  
Ryan, Coughlin & Betke, LLP  
175 Federal Street  
Boston, MA 02110  
(617) 988-8050

**CERTIFICATE OF SERVICE**

I, Christopher G. Betke, hereby certify that on March 25, 2007, I served a copy of the within document via electronic filing to: Matthew H. Feinburg, Esq., Feinberg & Kamholtz, 125 Summer Street, 6<sup>th</sup> Floor, Boston MA 02110; Daniel Q. Harrington, Esq., Cozen & O'Connor, 1900 Market Street 3<sup>rd</sup> Floor, Philadelphia, PA 19103; Philip Tierney, Esq., Finnegan, Underwood, Ryan & Tierney, 22 Batterymarch Street, Boston, MA 02109.

/s/ Christopher G. Betke  
Christopher G. Betke